

Gentlemen/Ladies:

I am a very active CW and Phone Extra Class operator first licensed in 1958 and a member of the ARRL. I support RN-10413, but I wish to recommend modifications to the proposed novice band reallocations.

Background

Following a membership survey about a year ago the ARRL proposes per RM-10413 to reallocate half of the 50 KHz 80M and 40M novice band segments to Phone band expansion with the remaining half to CW. The ARRL proposes to reallocate all 100 KHz of the 15M novice band segment to CW; none of it would be reallocated to Phone band expansion.

I exchanged e-mails with ARRL official Rod Stafford, W6ROD, to determine the logic had been applied to the ARRL's novice band reallocation proposal. I received the following e-mail comment from W6ROD:

"The majority of the (ARRL) Board members voted for SOME expansion of the phone bands but not to the extend (sic) the committee wanted and certainly not to the extent that most hams responding to the survey seemed to want. That's it in a nutshell."

Comment

Per Mr. Stafford's e-mail, the novice band reallocation proposal submitted by the ARRL board was done with no apparent logic and was made arbitrarily and without full consideration of the wishes of the league members for greater allocation to phone band expansion in accordance with the results of the survey.

Counter proposal and comments

80M: I propose that the entire 50 KHz 80M novice band be reallocated to phone band expansion with fair re-apportionment of the entire Phone band by license class. As an active CW operator, it is my observation that that CW and digital mode operation is adequately contained between 3.5 to 3.6 MHz; there is almost no CW operation between 3.6 and 3.7 MHz. Accordingly, the ARRL proposal to allocate the lower 25 KHz to CW will probably be underused (wasted) if approved. Additionally, the 50 KHz novice segment is used in other countries in for Phone operation, therefore reallocation of all 50 KHz will facilitate intra-regional communications especially during emergencies. In fact, it seems logical to me for the FCC to take this opportunity extend the phone band all the way down to 3.6 MHz.

40M: I propose that the entire 50 KHz 40M novice band be reallocated to phone band expansion with fair re-apportionment of the entire Phone band by license class. I believe that ARRL proposal to allocate the lower 25 KHz to CW will probably be underused (wasted) if approved. As an active CW operator, it is my observation that CW and digital mode operation is adequately contained between 7.0 and 7.1 MHz.

15M: I propose that the entire 100 KHz 15M novice band be reallocated to phone band expansion with fair re-apportionment of the entire Phone band by license class. I believe that the ARRL proposal to allocate the entire 100 KHz to CW will probably be underused (wasted) if approved. As an active CW operator, it is my observation that CW and digital mode operation is adequately contained between 21.0 and 21.1 MHz. Additionally, the 15M novice band segment is used in other countries for Phone operation, therefore reallocation of all 100 KHz will facilitate intra-regional communications especially during emergencies and will eliminate the potential for interference between modes.

An official of the FCC (Bill Cross) commented in an open forum that he fears Phone band expansion because US amateurs would "invade" the private turf of foreign hams that dislike the US and cause them to become "ham band terrorists". I object to the notion that US hams should thus be relegated to the "back of the bus". I hope that this is not a pervasive view at the FCC and that the FCC will decide this matter objectively and in the best interest of the United States citizens and radio amateurs for whom you work.

John L. Barber, N5JB